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Of Counsel:
BURKE McPHEETERS BORDNER & ESTES

WILLIAM A. BORDNER 1371-0
(bbordner@bmbe-law.com)
JOHN REYES-BURKE 6251-0
(jburke@bmbe-law.com)
Suite 3100 - Mauka Tower
Pacific Guardian Center
737 Bishop Street
Honolulu, Hawaii 96813
Telephone No. (808) 523-9833
Fax No. (808) 528-1656

Attorneys for Defendant
FRANKLIN K. MUKAI

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD., a
Japanese corporation,

Plaintiff,
vs.

QK HOTEL, LLC, a Hawai`i limited
liability company, KG HOLDINGS
LLC, a Hawai`i limited liability
company, FRANKLIN K. MUKAI,

Defendants.

CIVIL NO. 04-00124 ACK/BMK
(Consolidated Case)

DEFENDANT FRANKLIN K.
MUKAI'S **SUBSTANTIVE JOINDER
IN MOTION FOR PRETRIAL
CONFERENCE AND TO MODIFY
STIPULATED PROTECTIVE
ORDER, FILED BY KG HOLDINGS,
LLC ON JANUARY 16, 2007;
CERTIFICATE OF SERVICE**

(No trial date assigned.)

SPORTS SHINKO (USA) CO., LTD.,
a Delaware corporation,

Plaintiff,

vs.

PUKALANI GOLF CLUB, LLC, a
Hawai`i limited liability company; KG
MAUI DEVELOPMENT, LLC, a
Hawai`i limited liability company; KG
HOLDINGS, LLC, a Hawai`i limited
liability company, FRANKLIN K.
MUKAI,

Defendants.

CIVIL NO. 04-00125 ACK/BMK

SPORTS SHINKO (USA) CO.,
LTD., a Delaware corporation,

Plaintiff,

vs.

KIAHUNA GOLF CLUB, LLC, a
Hawai`i limited liability company;
KG KAUAI DEVELOPMENT, LLC,
a Hawai`i limited liability company;
PUKALANI GOLF CLUB, LLC, a
Hawai`i limited liability company;
KG MAUI DEVELOPMENT, LLC, a
Hawai`i limited liability company;
MILILANI GOLF CLUB, LLC, a
Hawai`i limited liability company;
QK HOTEL, LLC, a Hawai`i limited
liability company; OR HOTEL, LLC,
a Hawai`i limited liability company,
and KG HOLDINGS, LLC, a Hawai`i

CIVIL NO. 04-00126 ACK/BMK

limited liability company, FRANKLIN
K. MUKAI,

Defendants.

SPORTS SHINKO CO., LTD., a
Japanese corporation,

Plaintiff,

vs.

OR HOTEL, LLC, a Hawai`i limited
liability company, KG HOLDINGS,
LLC, a Hawai`i limited liability
company, FRANKLIN K. MUKAI,

Defendants.

SPORTS SHINKO (USA) CO., LTD.,
a Delaware corporation,

Plaintiff,

vs.

MILILANI GOLF CLUB, LLC, a
Hawai`i limited liability company; KG
HOLDINGS LLC, Hawai`i limited
liability company, FRANKLIN K.
MUKAI,

Defendants.

CIVIL NO. 04-00127 ACK/BMK

CIVIL NO. 04-00128 ACK/BMK

**DEFENDANT FRANKLIN K. MUKAI'S SUBSTANTIVE JOINDER IN
MOTION FOR PRETRIAL CONFERENCE AND TO MODIFY
STIPULATED PROTECTIVE ORDER, FILED BY KG HOLDINGS, LLC
ON JANUARY 16, 2007**

Pursuant to LR 7.9, Defendant Franklin K. Mukai hereby substantively joins in Defendant KG Holdings, LLC's MOTION FOR PRETRIAL CONFERENCE AND TO MODIFY STIPULATED PROTECTIVE ORDER, filed on January 16, 2007.

Acknowledging that Mr. Mukai proposed the amended stipulated protective order ("SPO") attached to the aforementioned Motion, Mr. Mukai requests an additional provision therein, to be included as a new Paragraph 2.6 on page 5 of the proposed revised SPO, as follows:

2.6 insurers for the parties, including attorneys representing such insurers and/or their insureds in connection with the Litigation.

Mr. Mukai submits that, together with the adjustment of responsibilities both for establishing the grounds for confidentiality of materials produced for discovery and for bearing the substantial expenses associated therewith, the above proposed additional Paragraph 2.6 allows for necessary disclosure of such materials as required in connection with liability insurance implicated by the instant claims.

Defendant KG Holdings, LLC has agreed to the additional language stated above.

DATED: Honolulu, Hawaii, January 17, 2007.

/s/ John Reyes-Burke
WILLIAM A. BORDNER
JOHN REYES-BURKE
Attorneys for Defendant
FRANKLIN K. MUKAI

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD., a
Japanese corporation,

Plaintiff,
vs.

QK HOTEL, LLC, a Hawai`i limited
liability company, KG HOLDINGS
LLC, a Hawai`i limited liability
company, FRANKLIN K. MUKAI,

Defendants.

CIVIL NO. 04-00124 ACK/BMK
(Consolidated Case)

CERTIFICATE OF SERVICE

(No trial date assigned.)

FRANKLIN K. MUKAI,

Third-Party
Plaintiff,

vs.

SPORTS SHINKO (USA) CO.;
LTD., a Delaware corporation;
SPORTS SHINKO (HAWAII) CO.,
LTD., a Hawai`i corporation;
SPORTS SHINKO (MILILANI) CO.,
LTD., a Hawai`i corporation;
SPORTS SHINKO (KAUAI) CO.,
LTD., a Hawai`i corporation;
SPORTS SHINKO (PUKALANI)
CO., LTD., a Hawai`i corporation;
SPORTS SHINKO RESORT
HOTEL CORPORATION, a
Hawai`i corporation; SPORTS

SHINKO (WAIKIKI)
CORPORATION, a Hawai`i
corporation; and OCEAN RESORT
HOTEL CORPORATION, a
Hawai`i corporation,

Third-Party
Defendants.

SPORTS SHINKO (USA) CO., LTD.,
a Delaware corporation,

Plaintiff,

vs.

PUKALANI GOLF CLUB, LLC, a
Hawai`i limited liability company; KG
MAUI DEVELOPMENT, LLC, a
Hawai`i limited liability company; KG
HOLDINGS, LLC, a Hawai`i limited
liability company, FRANKLIN K.
MUKAI,

Defendants.

FRANKLIN K. MUKAI,

Third-Party
Plaintiff,

vs.

SPORTS SHINKO CO., LTD., a
Japan corporation, SPORTS
SHINKO (HAWAII) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO (MILILANI) CO., LTD., a

CIVIL NO. 04-00125 ACK/BMK

Hawai`i corporation, SPORTS SHINKO (KAUAI) CO., LTD., a Hawai`i corporation, SPORTS SHINKO (PUKALANI) CO., LTD., a Hawai`i corporation, SPORTS SHINKO RESORT HOTEL CORPORATION, a Hawai`i corporation, SPORTS SHINKO (WAIKIKI) CORPORATION, a Hawai`i corporation, and OCEAN RESORT HOTEL CORPORATION, a Hawai`i corporation,

Third-Party Defendants.

SPORTS SHINKO (USA) CO., LTD., a Delaware corporation,

Plaintiff,

vs.

KIAHUNA GOLF CLUB, LLC, a Hawai`i limited liability company; KG KAUAI DEVELOPMENT, LLC, a Hawai`i limited liability company; PUKALANI GOLF CLUB, LLC, a Hawai`i limited liability company; KG MAUI DEVELOPMENT, LLC, a Hawai`i limited liability company; MILILANI GOLF CLUB, LLC, a Hawai`i limited liability company; QK HOTEL, LLC, a Hawai`i limited liability company; OR HOTEL, LLC,

CIVIL NO. 04-00126 ACK/BMK

a Hawai`i limited liability company,
and KG HOLDINGS, LLC, a Hawai`i
limited liability company, FRANKLIN
K. MUKAI,

Defendants.

FRANKLIN K. MUKAI,

Third-Party
Plaintiff,

vs.

SPORTS SHINKO CO., LTD., a
Japan corporation, SPORTS
SHINKO (HAWAII) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO (MILILANI) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO (KAUAI) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO (PUKALANI) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO RESORT HOTEL
CORPORATION, a Hawai`i
corporation, SPORTS SHINKO
(WAIKIKI) CORPORATION, a
Hawai`i corporation, and OCEAN
RESORT HOTEL
CORPORATION, a Hawai`i
corporation,

Third-Party
Defendants.

SPORTS SHINKO CO., LTD., a
Japanese corporation,

CIVIL NO. 04-00127 ACK/BMK

Plaintiff,

vs.

OR HOTEL, LLC, a Hawai`i limited liability company, KG HOLDINGS, LLC, a Hawai`i limited liability company, FRANKLIN K. MUKAI,

Defendants.

FRANKLIN K. MUKAI,

Third-Party Plaintiff,

vs.

SPORTS SHINKO (USA) CO.; LTD., a Delaware corporation; SPORTS SHINKO (HAWAII) CO., LTD., a Hawai`i corporation; SPORTS SHINKO (MILILANI) CO., LTD., a Hawai`i corporation; SPORTS SHINKO (KAUAI) CO., LTD., a Hawai`i corporation; SPORTS SHINKO (PUKALANI) CO., LTD., a Hawai`i corporation; SPORTS SHINKO RESORT HOTEL CORPORATION, a Hawai`i corporation; SPORTS SHINKO (WAIKIKI) CORPORATION, a Hawai`i corporation; and OCEAN RESORT HOTEL CORPORATION, a Hawai`i corporation,

Third-Party

Defendants.

SPORTS SHINKO (USA) CO., LTD.,
a Delaware corporation,

Plaintiff,

vs.

MILILANI GOLF CLUB, LLC, a
Hawai`i limited liability company; KG
HOLDINGS LLC, Hawai`i limited
liability company, FRANKLIN K.
MUKAI,

Defendants.

FRANKLIN K. MUKAI,

Third-Party
Plaintiff,

vs.

SPORTS SHINKO CO., LTD., a
Japan corporation, SPORTS
SHINKO (HAWAII) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO (MILILANI) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO (KAUAI) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO (PUKALANI) CO., LTD., a
Hawai`i corporation, SPORTS
SHINKO RESORT HOTEL
CORPORATION, a Hawai`i

CIVIL NO. 04-00128 ACK/BMK

corporation, SPORTS SHINKO
(WAIKIKI) CORPORATION, a
Hawai`i corporation, and OCEAN
RESORT HOTEL
CORPORATION, a Hawai`i
corporation,

Third-Party
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served electronically through CM/ECF:

PAUL ALSTON, ESQ.	palston@ahfi.com	1/17/07
GLENN T. MELCHINGER, ESQ.	gtm@ahfi.com	1/17/07
Alston Hunt Floyd & Ing 1800 ASB Tower 1001 Bishop Street Honolulu, HI 96813		

Attorneys for Plaintiffs
and Third-Party Defendants

WARREN PRICE, III, ESQ.	wprice@pohlhawaii.com	1/17/07
ROBERT A. MARKS, ESQ.	ram@pohlhawaii.com	1/17/07
Price Okamoto Himeno & Lum 728 Ocean View Center 707 Richards Street Honolulu, HI 96813		

Attorney for Defendants
KG HOLDINGS, LLC
KG KAUAI DEVELOPMENT, LLC;

KG MAUI DEVELOPMENT, LLC;
KIAHUNA GOLF CLUB, LLC;
MILILANI GOLF CLUB, LLC
OR HOTEL, LLC;
PUKALANI GOLF CLUB, LLC
PUKALANI GOLF CLUB, LLC;
and QK HOTEL, LLC

DATED: Honolulu, Hawaii, January 17, 2007.

/s/ John Reyes-Burke

WILLIAM A. BORDNER
JOHN REYES-BURKE
Attorneys for Defendant
and Third-Party Plaintiff
FRANKLIN K. MUKAI